



November 13, 2015

Ms. Jan Palumbo (AWT-150)  
United States EPA, Region 10  
1200 Sixth Avenue, Suite 900  
Seattle, WA 98101

**Subject: October/November 2015 Progress Report  
J.H. BAXTER ARLINGTON FACILITY  
Docket No. RCRA-10-2001-0086**

Dear Ms. Palumbo:

This letter provides the October 15-November 14, 2015 progress report for work under the Administrative Order on Consent (AOC) for the J.H. Baxter & Co. (Baxter) facility during the period from September 15, 2015, to October 14, 2015.

#### **SIGNIFICANT DEVELOPMENTS THIS PERIOD**

This section discusses significant developments for the reporting period, including actions performed and any problems encountered relative to work required by the AOC. Significant developments that occurred on this project during this reporting period are outlined below:

- Results from the comprehensive groundwater sampling conducted in September are attached to this Progress Report. Key findings include:
  - PAHs were detected in 3 wells of the 16 wells sampled for PAHs at concentrations below 1 ug/L (Figures 4 and 5, Table 3-5). Two of the wells (MW-1 and MW-3) are located in the source area and one well, MW-15, is located downgradient of the Site. Total PAHs in MW-15 were 0.0126 ug/L and are comprised of 2 PAHs that had estimated (J-flagged) detections. This is consistent with historic concentrations (Appendix C trend plots).
  - PCP is generally consistent with historic results, with a few exceptions.
    - PCP was detected in MW-3, located directly downgradient of the infiltration trench, at 1,500 ug/L. This is likely due to the increased gradient between extraction wells and injection trench which will temporarily cause the residual product in the area to mobilize until it reaches equilibrium at the increased hydraulic gradient.



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- An increase was observed in well MW-32, although within historic ranges, at 500 ug/L. This well is also located directly adjacent to the infiltration trench (upgradient).
  - There was a decrease in PCP concentration in MW-34, located directly downgradient of extraction well EW-4, from 1,800 to 100 ug/L which is likely a result of the recirculation system being back in operation.
  - PCP concentrations in the intermediate wells with iSOCs are similar to historic concentrations. The influence of injecting oxygen into the groundwater should result in reductions in concentrations in these wells over time. The influence of the injection of oxygen will primarily affect groundwater downgradient of the well and as a result may take some time before concentrations decrease in the wells containing the iSOCs.
- In August and early September, the CMS was revised (Version 4) to incorporate the results of the oxidation bench scale study and incorporate EPA comments. EPA informed the Baxter team that Battelle had been contracted to review the data from the site and provide corrective measure recommendations to EPA. EPA requested that the Baxter team place the CMS on hold until the Battelle report is completed and EPA and Baxter teams have met to discuss the ramifications of the Battelle recommendations. No work was conducted on the CMS this month pending direction from EPA.
  - The recirculation system continued to operate at 30 gpm. There was one shutdown due to a power outage. The system was started back up within 2 days and the iSOC oxygen tanks were recharged during the Site visit.

## ANTICIPATED DEVELOPMENTS NEXT PERIOD

This section discusses developments anticipated during the next reporting period, as outlined below:

- Baxter will continue to operate the Pilot Study remediation system (recirculation system) during the next reporting period.
- EPA will provide the Baxter team with the Battelle report and set up a technical meeting to discuss the path forward.

Any other information relevant to the AOC is discussed in this section, including results of any sampling or testing completed within the reporting period.

- No sampling was conducted during this reporting period.





## CERTIFICATION

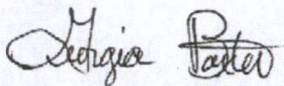
I certify that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to evaluate the information submitted. I certify that the information contained in or accompanying this submittal is true, accurate, and complete. As to those identified portions(s) of this submittal for which I cannot personally verify the accuracy, I certify that this submittal and all attachments were prepared in accordance with procedures designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those directly responsible for gathering the information, or the immediate supervisor of such person(s), the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Signature:

Name: Georgia Baxter  
Title: Chief Executive Officer  
Date: April 8, 2015

We trust this letter meets the intent of the Progress Report per Paragraph 71 of the AOC. If you have any questions, please contact me at (650) 349-0201.

Sincerely,



Georgia Baxter  
Chief Executive Officer

cc: Jeanne Tran, Ecology  
Jamie Hillery, Stella-Jones Corp.  
RueAnn Thomas, Nattura Group

